

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:)	
)	
Ezell Morris)	Case No. 15-10181-JDL
Betty Deloris Morris)	Chapter 13
)	
Debtors.)	

RESPONSE TO SECOND AMENDED MOTION TO SELL PROPERTY

COMES NOW John Hardeman, Chapter 13 Trustee, and files his Response to the Second Amended Motion to Sell Property Free and Clear of Liens. In response, the Trustee would offer the following:

The Trustee has no objection to the proposed sale, but requests that any order approving the sale specifically provide the sales proceeds above the amount required to satisfy the mortgage obligation referenced in the Motion be paid directly to the Trustee for the benefit of priority and nonpriority unsecured creditors. Based on the most recent plan filed by the debtors, they are in agreement with such use. The Trustee further requests that he be provided with a copy of the final settlement statements and that the excess proceeds be mailed directly by the closing company to the Trustee at his Memphis payment address.

Wherefore, John Hardeman, Chapter 13 Trustee, responds to the Second Amended Motion to Sell Property and respectfully requests that the relief granted by the Court be in accordance with the requests of the Trustee contained in his Response.

Respectfully submitted,

s/Linda Ruschenberg
Linda Ruschenberg, OBA# 12842
Attorney for Trustee
321 Dean A. McGee
P.O. Box 1948
Oklahoma City, OK 73101-1948
13trustee@chp13okc.com
(405) 236-4843
(405) 236-1004 (fax)

CERTIFICATE OF MAILING

This is to certify that on the 8th day of July, 2015 a true and correct copy of the foregoing document was mailed by first-class mail, postage pre-paid, to all parties listed on the attached address list.

s/Linda Ruschenberg